

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

**JASON DAVID BROWN, LASZLO BOZSO,
and MERIS DUDZIC, individually and on
behalf of all others similarly situated,**

Plaintiffs,

v.

**LOWE’S COMPANIES, INC., and
LEXISNEXIS SCREENING SOLUTIONS,
INC.**

Defendants.

**No. 5:13-CV-00079-RLV-DSC
(consolidated case number)**

**APRIL INGRAM-FLEMING, individually
and on behalf of all others similarly situated,**

Plaintiff,

v.

**LOWE’S HOME CENTERS, LLC, d/b/a
LOWE’S,**

Defendant.

No. 5:15-CV-00018-RLV-DSC

**MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND
CERTIFICATION OF A SETTLEMENT CLASS**

Plaintiffs, Jason Brown, Laszlo Bozso, Meris Dudzic and April Ingram-Fleming, pursuant to Rule 23 of the Federal Rules of Civil Procedure and LCvR 7.1, hereby respectfully move the Court for certification of a settlement class and for preliminary approval of a class action settlement. Plaintiffs show that the settling Defendant, Lowe’s Companies, Inc., joins in the motion.

In further support, the parties respectfully direct the Court to the Plaintiffs’ brief in

support and exhibits, filed herewith. The parties' Settlement Agreement and Release is attached to the brief as Exhibit 1 thereto. A proposed order granting the preliminary approval of the settlement and conditionally certifying a settlement class is attached to the Settlement Agreement as Exhibit D to said agreement.

Wherefore, the parties respectfully ask the Court to enter the proposed preliminary approval order: (1) preliminarily certifying an opt-out class for purposes of the settlement; (2) preliminarily approving the proposed settlement agreement; (3) approving the form and manner of notice, and (4) setting a date for a final fairness hearing and final approval of the proposed settlement and corresponding interim deadlines for dissemination of notice and for objections by class members; and (5) for such other and further relief as the Court deems just and proper.

Respectfully submitted this 7th day of December, 2015.

s/Mona Lisa Wallace
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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: All counsel of record in this case, including:

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